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Attorneys for Plaintiffs
McKESSON CORPORATION AND
HBO & COMPANY, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

E-FILED - 5/24/06

McKESSON CORPORATION, and
HBO & COMPANY, INC.,

Plaintiffs,

v.

ARTHUR ANDERSEN LLP, ROBERT
PUTNAM, and DOES 1-20,

Defendants.

Case No. C-05-04020 RMW

**STIPULATION AND ~~PROPOSED~~
ORDER RE:**

- 1. COORDINATED BRIEFING AND
HEARING SCHEDULE ON
RESPONSES TO AMENDED AND
SUPPLEMENTAL COMPLAINT;
AND**
- 2. RESCHEDULING OF INITIAL
CASE MANAGEMENT
CONFERENCE**

Date: N/A
Time: N/A
Dept.: Courtroom 6 - 4th Floor

1 WHEREAS, on August 11, 2005, Plaintiffs McKesson Corporation ("McKesson") and
2 HBO & Company, now known as McKesson Information Solutions LLC ("HBOC") (collectively,
3 "Plaintiffs") filed a complaint against Defendants Arthur Andersen LLP ("Andersen") and Robert A.
4 Putnam ("Putnam" and together with Andersen and Plaintiffs, the "Parties") in the Superior Court of the
5 State of California in and for the County of San Francisco (the "McKesson Complaint");

6 WHEREAS, on October 5, 2005, Putnam filed a Notice of Removal in the San Jose
7 Division of the United States District Court for the Northern District of California;

8 WHEREAS, on or about February 24, 2006, the Parties entered into a Stipulation and
9 [Proposed] Order RE: (1) Consolidated Briefing on Motions to Dismiss; (2) Briefing and Hearing
10 Schedule; and (3) Changing Date for Case Management Conference, pursuant to which the Parties agreed,
11 among other things, to a schedule for the briefing and hearing on motions to dismiss and related motions
12 that Andersen and Putnam expected to file in response to the McKesson Complaint, which was approved
13 by the Court on March 14, 2006;

14 WHEREAS, on March 2, 2006, Defendants Andersen and Putnam responded to the
15 McKesson Complaint by filing motions to dismiss the McKesson Complaint pursuant to Rule 12(b)(6)
16 of the Federal Rules of Civil Procedure and motions to strike certain portions of the complaint; and

17 WHEREAS, on or about March 21, 2006, the Parties entered into a Stipulation and
18 [Proposed] Order RE: Briefing and Hearing Schedule On Motions To Dismiss And Motions To Strike,
19 pursuant to which the Parties agreed, among other things, to modify the briefing and hearing schedule on
20 the pending motions to dismiss and motions to strike, and to set the hearing on those motions for the same
21 day as the scheduled initial case management conference, which was and is currently set for June 16, 2006;

22 WHEREAS, on March 30, 2006, Andersen served on counsel for McKesson and HBOC
23 a copy of a complaint filed by Andersen against McKesson and HBOC in the United States District Court
24 for the Northern District of California, Case No. C-06-02035 JW (RS) (the "Andersen Complaint");

25 WHEREAS, pursuant to Northern District Local Rule 3-12, in a Related Case Order dated
26 April 14, 2006, this Court found that Case No. C-06-02035 is related to the class action captioned In re
27 McKesson HBOC, Inc. Securities Litigation (Master File No. CV 99-20743 RMW) and reassigned that
28 action to this Court;

WHEREAS, the parties agree that Case No. C-06-02035 is also related to the above-captioned action;

WHEREAS, prior to filing an opposition to Andersen's and Putnam's motions to dismiss the McKesson Complaint, McKesson and HBOC informed Andersen and Putnam of their intention to file an Amended and Supplemental Complaint;

WHEREAS, in light of McKesson and HBOC's intention to file an Amended and Supplemental Complaint, Andersen and Putnam agreed to withdraw their motions to dismiss and all related motions and requests and to coordinate the briefing on responses to McKesson's Amended and Supplemental Complaint with responses to the Andersen Complaint filed in Case No. C-06-02035, and to coordinate the scheduled initial case management conference in this action with the coordinated hearings on those motions;

WHEREAS, pursuant to stipulation of the parties, McKesson and HBOC filed their Amended and Supplemental Complaint on April 28, 2006;

WHEREAS, the Parties have agreed on a coordinated schedule for the briefing and hearings on motions to be filed in response to the Amended and Supplemental Complaint in this action and the Andersen Complaint filed in Case No. C-06-02035, and on a new date for the initial case management conference in this action, all subject to the approval and convenience of the Court;

WHEREAS, the parties are simultaneously entering into a separate stipulation in Case No. C-06-02035 reflecting this coordinated schedule;

ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties that:

- (a) Andersen and Putnam shall answer, move or otherwise respond to the Amended and Supplemental Complaint on or before June 16, 2006;
- (b) Any papers filed in opposition to any motion filed in response to the Amended and Supplemental Complaint in this action shall be filed and served (by e-mail and overnight mail) on or before August 4, 2006;
- (c) Any reply papers filed in further support of any motion filed in response to the Amended and Supplemental Complaint in this action shall be filed and served (by

e-mail and overnight mail) on or before September 1, 2006;

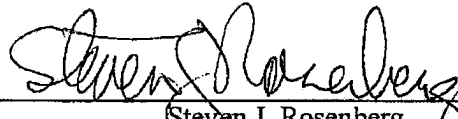
(d) Subject to the availability of the Court, the hearing on any motions filed in response to the Amended and Supplemental Complaint in this action shall be noticed for September 22, 2006, at 9:00 a.m. or as soon thereafter as the matter may be heard;

(e) Subject to the availability of the Court, the initial case management conference originally scheduled for June 16, 2006, shall be held on September 22, 2006, at 9:00 a.m. or as soon thereafter as the Court can hold the conference, to coincide with the hearings on any motions in response to the Amended and Supplemental Complaint.

DATED: May 12, 2006

LAW OFFICES OF STEVEN J. ROSENBERG, P.C.

By


Steven J. Rosenberg
Attorneys for Defendant
ROBERT A. PUTNAM

DATED: May __, 2006

ALSCHULER GROSSMAN STEIN & KAHAN LLP

By

Scott Vick
Attorneys for Defendant
ARTHUR ANDERSEN LLP

1 e-mail and overnight mail) on or before August 25, 2006;

2 (d) Subject to the availability of the Court, the hearing on any motions filed in
3 response to the Amended and Supplemental Complaint in this action shall be
4 noticed for September 15, 2006;

5 (e) Subject to the availability of the Court, the initial case management conference
6 originally scheduled for June 16, 2006, shall be held on September 15, 2006, to
7 coincide with the hearings on any motions in response to the Amended and
8 Supplemental Complaint.

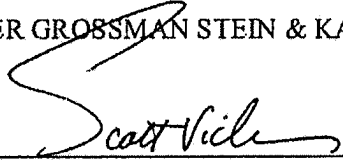
9
10 DATED: May __, 2006

LAW OFFICES OF STEVEN J. ROSENBERG, P.C.

11
12 By _____
13 Steven J. Rosenberg
14 Attorneys for Defendant
15 ROBERT A. PUTNAM
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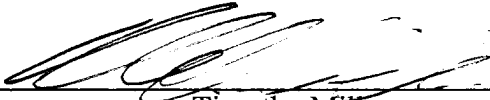
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18 DATED: May 10, 2006

ALSCHULER GROSSMAN STEIN & KAHAN LLP

19
20 By  _____
21 Scott Vick
22 Attorneys for Defendant
23 ARTHUR ANDERSEN LLP
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26
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1 DATED: May 12, 2006

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

2
3 By 
4 Timothy Miller
5 Attorneys for Plaintiffs
6 McKESSON CORPORATION and
7 HBO & COMPANY, now known as
8 McKesson Information Solutions LLC

9
10 **ORDER**

11 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

12
13 DATED: 5/24, 2006

14 /s/ Ronald M. Whyte
15 The Honorable Ronald M. Whyte
16 United States District Judge